



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES

William R. Snodgrass - Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

May 15, 2017

The Honorable Roger Pafford
Mayor
City of Camden
P.O. Box 779
Camden, TN 38320

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
RECEIPT # 9414 7266 9904 2096 0234 63

Re: Pretreatment Audit Inspection
Camden Pretreatment Program
NPDES Permit No. TN0064611
Benton County
Notice of Violation

Dear Mayor Pafford:

The Division of Water Resources (Division) appreciates your staff's time on February 22, 2017, when Mr. Bud Lewis and Ms. Laurel Rognstad met with Mr. Anthony French and Mr. David Tuck to conduct a Pretreatment Audit Inspection of Camden's industrial pretreatment program. The comments below are based on the results of the inspection.

1. Camden's NPDES permit was issued on April 1, 2013, and became effective on May 1, 2013. Part 3.2.a.ix. of the NPDES permit requires Camden to submit to the Division a written technical evaluation of the need to revise local limits within 120 days of the effective date of the permit. No documentation could be found of Camden's technical evaluation. Therefore, this letter serves as a Notice of Violation for failure to submit the required technical evaluation of the need to revise local limits. Camden should take appropriate actions to submit a technical evaluation of the need to revise local limits by August 18, 2017. Failure to submit the required report may result in escalation of enforcement, including potential civil penalties.
2. During the audit, it was discovered that MagPro, LLC (Magpro) has not been analyzing their effluent for toluene, benzene, or total phthalates as required by the industrial user permit issued May 1, 2016. Camden should follow its approved Enforcement Response Plan (ERP) to take appropriate enforcement action for the industry's failure to monitor toluene, benzene, and total phthalates. Additionally, please ensure that in the future, all industrial user reports are thoroughly reviewed for compliance with the industry's permit.
3. Magpro is Camden's only significant industrial user (SIU). Because Magpro discharges to Camden intermittently and infrequently, Camden and Magpro have been taking samples of the

recirculating process water when the industry is not discharging in order to meet compliance monitoring and self-monitoring requirements. In accordance with Tennessee Rule 0400-40-14-.12(7), the industry is required to report the results of sampling and analysis of the discharge. Additionally, Tennessee Rule 0400-40-14-.08(6)(b)5. requires Camden to sample and analyze the effluent of each SIU.

While it is acceptable for Camden or Magpro to analyze samples of the recirculating process water for process control procedures, these results do not meet the compliance monitoring and self-monitoring requirements from Tennessee Rule 0400-40-14. Camden should take appropriate steps to ensure samples of the industry's discharge are taken by both the City and the industry for compliance monitoring and self-monitoring. If the industry does not discharge during a reporting period, samples for compliance cannot be taken. As Mr. French and Ms. Rognstad discussed, we recommend revising the permit to include requirements for the industry to notify Camden prior to discharging to ensure the City has the opportunity to obtain samples. Additionally, Camden may require the industry to submit a zero discharge certification when no process wastewater is discharged during a reporting period.

4. Camden's pretreatment semi-annual report (SAR) for the April 1, 2016 to September 30, 2016 reporting period was reviewed and discussed as part of the audit.
 - a. Form No. 1 of the SAR indicates that the effluent of the WWTP exceeded the pass through limit (PTL) for total phenols. However, this exceedance is not listed on Form No. 2, and no corrective action was documented. Please revise Form No. 2 to indicate the total phenols PTL exceedance and corrective action taken, if any.
 - b. Form No. 4 of the SAR indicates Camden inspected Magpro on October 3, 2016. Additionally, Form No. 7 indicates Camden inspected Magpro once during the reporting period. Because the October 3rd inspection did not take place during the reporting period, Form No. 7 should not indicate any inspections took place. Please revise Form No. 7 to correctly indicate zero inspections during the reporting period. The October 3rd inspection should be included on the SAR for the reporting period from October 1, 2016 to March 31, 2017.

Please submit the required SAR revisions to this office by June 19, 2017.

5. A copy of Camden's approved pretreatment program was requested during the audit. The program, approved April 30, 2003, could not be found on file at Camden's wastewater treatment plant. Camden's approved pretreatment program should be accessible to the pretreatment coordinator. If the program cannot be found, please request a copy from Tennessee Department of Environment and Conservation, Division of Water Resources. As Ms. Rognstad and Mr. French discussed during the inspection, the approved program should be reviewed to ensure that all sampling and inspections are conducted at the frequencies required in the program. If Camden would like to modify the approved pretreatment program, this request should be submitted to our office for review and approval.
6. During the audit, Mr. French and TDEC staff discussed the elements of conducting an industrial inspection. We recommend conducting a file review annually to ensure that the industry is maintaining records as required by the industrial user permit.

7. During the audit, the industrial user files and permit for Magpro were reviewed.

- a. Magpro's industrial user permit specifies grab sampling for all regulated parameters. However, Tennessee Rule 0400-40-14-.12(7)(c) requires flow-proportional composite sampling for some parameters, unless time-proportional or grab sampling is representative of the discharge, and this decision is documented in the industrial user's file. Attachment B, Section 1(a) states that grab samples are collected because "it is not practical to collect composite samples with an automatic sampling device." However, this is not an appropriate rationale and does not justify the use of grab sampling in lieu of flow-proportional composite sampling. Camden should ensure that flow-proportional composite samples are being obtained for the required parameters, unless grab sampling is representative of the discharge. If grab sampling is authorized, the rationale for this decision should be kept in the pretreatment files for the industry.
- b. Camden's contract laboratory has been analyzing compliance monitoring samples for Chemical Oxygen Demand (COD). However, the industrial user permit requires monitoring of Biochemical Oxygen Demand (BOD₅). Mr. French indicated that he has notified the contract laboratory to analyze samples for BOD₅. Please ensure that in the future, samples are analyzed for all parameters in Magpro's industrial user permit.
- c. Magpro's industrial user permit includes a minimum pH limitation of 6.0 standard units (S.U.). However, the permit does not include a maximum pH limitation. Because the industry uses lime to adjust the pH of the process wastewater, we strongly recommend including both a minimum and a maximum pH limitation in the permit.

8. The pretreatment program is extremely complex. Therefore, it is recommended that your pretreatment coordinator receive additional pretreatment training in order to ensure that Camden's pretreatment program is properly implemented.

We appreciate the cooperation and hospitality shown during the inspection. Please provide to this office, by June 19, 2017, a written description of the actions Camden will take to address these comments. If you have any questions, please do not hesitate to contact Laurel Rognstad (615) 532-8786 or Laurel.Rognstad@tn.gov.

Sincerely,



Jessica Murphy
Manager
Compliance and Enforcement Unit

cc: Mr. Ken Lewis – Division of Water Resources, Jackson EFO
Mr. Anthony French, Pretreatment Coordinator – City of Camden